

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
AT LAFAYETTE**

AARON GUIDRY, *et al.*,

Plaintiffs,

v.

TERESA ELBERSON, *et al.*

Defendants.

c/w

AMBER ROBINSON and MATTHEW
HUMPHREY,

Plaintiffs in Intervention,

v.

TERESA ELBERSON,

Defendant.

CIVIL ACTION NO. 6:18-CV-01232

JUDGE ROBERT SUMMERHAYS

MAG. JUDGE PATRICK HANNA

**INTERVENORS' MOTION FOR TEMPORARY RESTRAINING ORDER AND, IN DUE
COURSE, PRELIMINARY INJUNCTION**

By this motion and pursuant to Rule 65 of the Federal Rules of Civil Procedure as well as Local Rule 65.1, Plaintiffs-in-Intervention Amber Robinson and Matthew Humphrey seek a temporary restraining order and preliminary injunction ordering Defendant Teresa Elbersen to cease and desist implementation of a policy disallowing use of the public library for the planning or conduct of Drag Queen Story Time and to allow intervenors to proceed with their events without content limitation and without requiring completion of a form disavowing affiliation with Drag Queen Story Time.

A supporting memoranda accompanies this motion. In brief, Intervenor seek relief because Defendant's policy of requiring completion of a form disavowing affiliation with Drag Queen Story Hour is a prior restraint based on the content and viewpoint of the Intervenor and it is plainly unconstitutional. Also unconstitutional is Defendant's policy of not allowing individuals associated with holding or planning "Drag Queen Story Hour" or "Drag Queen Story Time" (directly or indirectly) to use the Library for those purposes.

Respectfully Submitted,

/s/ Katie Schwartzmann

/s/ Bruce Hamilton

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RULE 65 CERTIFICATE

As required by Local Rule 65.1 undersigned counsel hereby certifies that she provided notice to all counsel and parties of this intended filing on December 20, 2018 and sought resolution of the matter. Copies of all pleadings have since been supplied to all via electronic mail as required by the local rule.

/s/ Katie Schwartzmann

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of December, 2018, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, and that service will be provided on all users through the CM/ECF system.

/s/ Katie Schwartzmann